

IN THE UNITED STATES BANKRUPTCY COURT FOR  
THE SOUTHERN DISTRICT OF MISSISSIPPI

IN THE MATTER OF:

CHAPTER 13 NO.:

DANNY RAY JONES AND  
DONNA BOYER ROSA

21-00249 - JAW

TRUSTEE'S RESPONSE TO  
DEBTORS' MOTION TO MODIFY

COMES NOW Trustee, Harold J. Barkley, Jr., and files his Response to Debtors' Motion to Modify (DK # 33); and in support thereof would most respectfully show unto this Honorable Court as follows:

1. That, the Debtors are delinquent \$5,891.00 through July 2022. The Trustee needs time to review the supplemental Schedules "I" and "J" once they are filed, before taking a position on said Motion to Modify.

WHEREFORE, PREMISES CONSIDERED, Trustee prays that this Response be received and filed, and at a hearing hereon this Honorable Court will enter its Order sustaining Trustee's Response, and for such other, further and general relief to which the Trustee and this bankruptcy estate may be entitled.

Dated: July 19, 2022

Respectfully submitted,

/s/ Harold J. Barkley, Jr.  
HAROLD J. BARKLEY, JR. - MSB #2008  
CHAPTER 13 TRUSTEE  
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C E R T I F I C A T E

I, Harold J. Barkley, Jr., Trustee do hereby certify that I have this date mailed a true and correct copy of the foregoing pleading to the following parties by United States Mail, postage prepaid or by ECF Filing Notification:

Office of the U. S. Trustee  
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Hon. Jennifer A. Curry Calvillo  
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Donna Boyer Rosa  
6811 Old Canton Road  
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Ridgeland, MS 39157

Dated: July 19, 2022

/s/ Harold J. Barkley, Jr.  
HAROLD J. BARKLEY, JR.